

Vraid Systems Limited

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Privacy Policy

November 2022

Vraid Systems Limited (“the Advisor”, “firm”, “we”), as a Registered Investment Adviser, is covered under the definition of a “financial institution” under the Gramm-Leach-Bliley Act and the Securities and Exchange Commission’s (“SEC”) Privacy of Consumer Financial Information Rule (“Regulation S-P”).

This “Privacy Notice” describes how we collect, store, use, disclose and protect your personal information that may directly, or indirectly, identify you during and after your working relationship with us and/or through our “Website.” We use the term “Personal Information” to describe information that can be associated with you and can be used to identify you. Personal Information does not include information that does not identify a specific person or that is publicly available. In particular, this Privacy Notice describes the basis upon which and for what purposes we process your Personal Information, how we share your Personal information and how we protect and safeguard your Personal Information.

We will never sell or share the nonpublic personal information obtained from or in reference to clients. Additionally, we will not sell or share your Personal Information for marketing purposes. All information provided by clients to Vraid Systems Limited and its staff, and information and advice furnished to clients by us, shall be treated as confidential and shall not be disclosed to affiliated or unaffiliated third parties, except as permitted or directed by clients with written authorization, by application to facilitate the investment services offered by the firm via an unaffiliated financial services provider, or as required by any rule, regulation or law.

Except as required by law, Vraid Systems Limited does not share confidential information about clients with nonaffiliated parties. It is our policy to restrict access to all current and former clients' information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services in furtherance of the client's engagement of the Advisor. We permit only authorized employees and affiliates who have acknowledged receipt and understanding of our Privacy Policy (by acknowledging and accepting our firm's Compliance Policies and Procedures) to have access to client information. Employees violating our Privacy Policy will be subject to our disciplinary process. If there are

any changes to this policy, we will provide clients with written notice and clients will be provided an opportunity to direct us as to whether such changes are permissible.

Why We Collect and How We Use Personal Information

To conduct regular business, Vraid Systems Limited may collect Personal Information from sources such as:

- Information reported by the client on applications or other forms the client provides to the firm
- Information about the client's transactions implemented by the firm or others
- Information developed as part of financial plans, analyses, or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for the Advisor to provide access to client information within the firm and to nonaffiliated companies, with whom we have entered into agreements.

The disclosure of Personal Information contained in any document completed by the client for processing and/or transmittal by the Advisor to facilitate the commencement/continuation/termination of a business relationship between the client and/or between the Advisor and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of the Advisor (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third-party service provider.

Sharing Information with Other Companies Permitted Under Law

Vraid Systems Limited may disclose the client's information: (1) to individuals and/or entities not affiliated with the Advisor, including, but not limited to the client's other professional advisors and/or certain service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, proxy management service provider, etc.) that may be recommended or engaged by the Advisor in furtherance of the client's engagement of the Advisor ; (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. Since Varid Systems Limited shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's customers or former customers to anyone, except as permitted by law. In the event that the firm has a change to its client privacy policy that would allow it to disclose non-public information not covered under applicable law, the firm will allow its clients the opportunity to opt out of such disclosure. Finally, the Advisor strives to only recommend financial services providers that share

its privacy policies; however, clients are encouraged to request each specific firm's written policy for review.

Procedures to Protect Confidentiality and Security of Your Personal Information

Vraid Systems Limited has procedures in place that limit access to Personal Information to those employees who need to know such information in order to perform business services. In addition, the Advisor maintains physical, electronic and procedural safeguards to guard your Personal Information.

Vraid Systems Limited has also adopted the following policies in order to safeguard the Personal Information of our clients in accordance with applicable law:

1. The Advisor is committed to protecting the confidentiality and security of the Client Information it collects and will handle Personal Information about clients only in accordance with all applicable laws, rules and regulations. We shall ensure: (a) the security and confidentiality of client records and information; (b) that client records and information are protected from any anticipated threats and hazards; and (c) that unauthorized access to, or use of, client records or information is protected against. These security measures include computer safeguards and secured files and buildings.
2. We will maintain policies and procedures that are reasonably designed to safeguard Personal Information about clients and only permit appropriate and authorized access to, and use of, Personal Information about clients through the application of appropriate administrative, technical, and physical protections.
3. To the extent required by applicable law, we shall direct each of our service providers to adhere to our Privacy Policies with respect to all Personal Information provided to such service providers.
4. We shall not disclose any Personal Information about our clients or former clients to anyone, except as permitted or required by law.
5. Vraid Systems Limited shall issue notices of its Privacy Notice to its clients initially and on an annual basis thereafter to the extent required by applicable law.

By disclosing your Personal Information to Vraid Systems Limited, you consent to the collection, storage, and processing of this information by us in a manner consistent with this Privacy Policy and Notice.

Linking to Third Party Websites

We may provide links to third party websites. If you follow links to third-party websites not affiliated or controlled by Vraid Systems Limited, you should review that third-party's privacy and security policies and other terms and conditions, as they may be different from our Privacy Policies and Notice. We do not guarantee and are not responsible for the privacy or security of

these third-party websites, including the accuracy, completeness, or reliability of their information.

Children

Our Website is not directed or intended for individuals under the age of thirteen (13), and we request that these individuals do not provide personal information through the Website. We do not knowingly collect or retain information from children under the age of 13 without parental consent. Visit the Federal Trade Commission website for more information about the Children's Online Privacy Protection Act (COPPA).

Former Clients

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality.

Changes to this Policy

Vraid Systems Limited will provide each client with initial notice of the firm's current privacy policy when the client relationship is established. We will also provide each client with a new notice of the firm's current privacy policy at least annually. If, at any time, Vraid Systems Limited adopts material changes to its privacy practices, the firm shall provide each client with a revised notice reflecting the new privacy practices.

Contact Us

Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Jason Zerbe, Chief Compliance Officer of Vraid Systems Limited. Contact information: jzerbe@vraidsys.com or 970-235-1163.